

NICHOLAS J. SANTORO, ESQ.  
Nevada Bar No. 532  
JAMES E. WHITMIRE, ESQ.  
Nevada Bar No. 6533  
SANTORO, DRIGGS, WALCH,  
KEARNEY, HOLLEY & THOMPSON  
400 South Fourth Street, Third Floor  
Las Vegas, Nevada 89101  
Telephone: 702/791-0308

*Attorneys for the Served Defendants*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LOUISIANA MUNICIPAL POLICE  
EMPLOYEES RETIREMENT SYSTEM,

Plaintiff,

v.

SHELDON GARY ADELSON, et al.,

Defendants.

Case No.: 2:11-cv-00595-RLH-(GWF)

**DEFENDANT MICHAEL LEVEN'S  
MOTION FOR ENLARGEMENT OF  
TIME TO RESPOND TO PLAINTIFF'S  
VERIFIED SHAREHOLDER  
DERIVATIVE COMPLAINT**

Defendant Michael Leven respectfully requests an enlargement of time to respond to Plaintiff's Verified Shareholder Derivative Complaint. In support of his motion, Defendant states as follows:

1. On April 18, 2011, Plaintiff filed a two-count shareholder derivative complaint against nominal defendant Las Vegas Sands Corp. ("LVS" or "the Company"), eight current directors of the Company, and one former director, among them defendant Leven. Dkt. 1. Plaintiff subsequently filed a corrected complaint on April 20, 2011. Dkt. 5. LVS was served with that complaint on May 6; Koo was served on May 8; Forman and Chafetz were served on May 17; and Ader was served on May 30. According to the plaintiff, Leven was served on July 22. Dkt. 52 at 4.

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2. On May 19, 2011, Plaintiff filed a motion to consolidate this action with two other nearly identical shareholder derivative suits filed in this District. Dkt. 33; *Moradi et al. v. Adelson*, No. 2:11-cv-00490-GMN; *Hardy v. Adelson et al.*, No. 2:11-cv-00636-RLH.<sup>1</sup> Plaintiff's counsel in *Moradi* has likewise filed a motion to consolidate the actions, and that motion was joined by Plaintiff's counsel in *Hardy*. Defendants agree that consolidation is in the best interest of all parties.

3. The Court in both *Moradi* (Dkt. 9) and *Hardy* (Dkt. 43) has issued a blanket enlargement of time for all defendants – served and unserved – to answer until forty days after the Court rules on the motions for consolidation.

4. This Court has already granted unopposed motions for enlargement of time for all defendants served prior to Leven. *See* Dkts. 38, 47.

5. In light of the various motions for consolidation, Defendant Leven requests that the time for all remaining defendants (including himself and all other directors not yet served) to answer or otherwise respond be enlarged to forty days after the Court rules on Plaintiff's motion.

6. Defendants' counsel raised the matter with Robin Winchester, counsel for Plaintiff in this action, but did not receive a response regarding whether Plaintiff opposes this request. Plaintiff did not previously oppose the extensions given to other defendants in this action.

7. The requested enlargement of time is reasonable and will not prejudice any party.

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<sup>1</sup> Two more nearly identical shareholder derivative suits have also been filed in Nevada state court. *Kohanim v. Adelson et al.*, No. A-11-636656-B (Clark Cty., Nev., Mar. 30, 2011); *Gaines v. Adelson et al.*, Case No. A-11-639645-B (Clark Cty., Nev., Apr. 18, 2011).

WHEREFORE, Defendant Michael Leven respectfully requests that the Court enlarge the time within which all named defendants may respond to Plaintiff's Verified Shareholder Derivative Complaint to forty days after the Court acts on Plaintiff's motion to consolidate.

DATED this 26<sup>th</sup> day of August, 2011.

SANTORO, DRIGGS, WALCH,  
KEARNEY, HOLLEY & THOMPSON

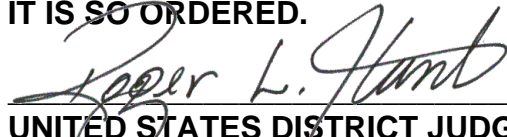
/s/ James E. Whitmire  
NICHOLAS J. SANTORO, ESQ.  
Nevada Bar No. 532  
JAMES E. WHITMIRE, ESQ.  
Nevada Bar No. 6533  
400 South Fourth Street, Third Floor  
Las Vegas, Nevada 89101

RICHARD A. SAUBER, ESQ.\*  
KATHRYN S. ZECCA, ESQ.\*  
ARIEL N. LAVINBUK, ESQ.\*  
ROBBINS, RUSSELL, ENGLERT, ORSECK,  
UNTEREINER & SAUBER LLP  
1801 K Street, NW, Suite 411L  
Washington, DC 20006  
Telephone: (202) 775-4500  
Fax: (202) 775-4510

\* Motions for admission *pro hac vice* forthcoming

*Attorneys for the Served Defendants*

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

DATED: August 29, 2011